IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI

UNITED STATES OF AMERICA ex rel. CAMERON JEHL,

Plaintiffs,

v.

Case No. 3:19-cv-091-NBB-JMV

GGNSC SOUTHAVEN LLC D/B/A GOLDEN LIVING CENTER-SOUTHAVEN et al.,

Defendants.

DEFENDANTS' REPLY TO RELATOR'S OPPOSITION TO DEFENDANTS' MOTION TO SUPPLEMENT DEFENDANTS' MOTION FOR AWARD OF ATTORNEYS' FEES AND OTHER EXPENSES

Defendants GGNSC Southaven LLC, GGNSC Administrative Services LLC, and GGNSC Clinical Services LLC ("Defendants") hereby respectfully submit their Joint Reply Memorandum in Support of Their Reply to Relator's Opposition to Defendants' Motion to Supplement Defendants' Motion for Award of Attorneys' Fees and Other Expenses.

The Reply is supported by the following exhibit and the supporting Memorandum of Law filed herewith:

Exhibit 1 – Declaration of Robert Salcido in Support of Defendants' Joint Reply in Support of Motion to Supplement Defendants' Motion for Award of Attorneys' Fees and Other Expenses.

July 3, 2023

Respectfully submitted,

/s/ Margaret Sams Gratz

Margaret Sams Gratz, Esq. (MSB # 99231) William Grant Armistead (MSB # 9786) Mitchell, McNutt & Sams, P.A. P. O. Box 7120 Tupelo, MS 38802-7120 Telephone: (662) 842-3871 Facsimile: (662) 842-8450 mgratz@mitchellmcnutt.com

Robert Salcido (*pro hac vice*)
D.C. Bar No. 447951
Akin Gump Strauss Hauer & Feld LLP
2001 K. Street, N.W.
Washington, D.C. 20006
Telephone: 202-887-4000
Facsimile: 202-887-4288
rsalcido@akingump.com

Attorneys for Defendants
GGNSC Southaven LLC; GGNSC
Administrative Services LLC; GGNSC
Clinical Services

CERTIFICATE OF SERVICE

This is to certify that I, Robert Salcido, one of the attorneys for GGNSC Southaven, LLC individually and on behalf of all Defendants have this day furnished a true and correct copy of the above and foregoing DEFENDANTS' REPLY TO RELATOR'S OPPOSITION TO DEFENDANTS' MOTION TO SUPPLEMENT DEFENDANTS' MOTION FOR AWARD OF ATTORNEYS' FEES AND OTHER EXPENSES to the following via ECF filing:

Robert B. McDuff (MSB # 2532) Law Office of Robert B. McDuff 767 North Congress Street Jackson, MS 39202 Telephone: 601.259.8484 rbm@mcdufflaw.com

Richard R. Barrett (MSB #99108) Law Office of Richard R. Barrett, PLLC 2086 Old Taylor Road Suite 1011 Oxford, MS 38655 Telephone 662.380.5018 rrb@rrblawfirm.net

Philip N. Elbert, Esq.
Lisa P. Binder, Esq.
Nathan C. Sanders, Esq.
Neal & Harwell, PLC
1201 Demonbreun St., Suite 1000
Nashville, TN 37203
pelbert@nealharwell.com
lbinder@nealharwell.com
nsanders@nealharwell.com

This 3rd day of July, 2023.

<u>/s/</u>	Re	obei					
	_	-		_			

Robert Salcido